

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

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In re: Equifax Inc. Customer Data  
Security Breach Litigation

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THEODORE H. FRANK and  
DAVID R. WATKINS,

Objectors.

MDL No. 17-2800-TWT

CONSUMER ACTIONS

Chief Judge Thomas W. Thrash, Jr.

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**FRANK AND WATKINS' MOTION TO STRIKE  
THE DECLARATION OF PROFESSOR ROBERT H. KLONOFF**

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Pursuant to Federal Rule of Evidence 702 and Civil Local Rule 26.2(C), Objectors Frank and Watkins move to strike the Declaration of Professor Robert H. Klonoff (Dkt. 858-2) for the reasons set forth in the accompanying memorandum of law.

Dated: December 2, 2019.

/s/ Melissa A. Holyoak

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*Attorneys for Objectors David R. Watkins  
and Theodore H Frank*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed with this Court via its CM/ECF service, which will send notification of such filing to all counsel of record.

Dated: December 2, 2019.

/s/ Melissa A. Holyoak